

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,

:

Plaintiff,

:

CASE NO. 3:22-CR-274

vs.

:

Judge James R. Knepp II

ANTHONY THEODOROU, D-2,

:

Magistrate Judge Darrell A. Clay

Defendant.

:

AFFIDAVIT OF BRIAN LESLIE

I, Brian Leslie, depose and state as follows:

1. I am a nationally recognized expert in coercive interrogation and interview techniques. I have over 14 years of previous law enforcement experience, I have written several books/articles on issues relevant to interrogation techniques, and I have been recognized (and called) as an expert in numerous civilian and military courts.
2. I have extensive experience reviewing interrogations and confessions to determine reliability based on improper and/or coercive interrogation techniques (including the Reid Technique and/or similar interrogation tactics).
3. I was contacted and hired to review the interrogation of Anthony Theodorou in connection with this case.
4. I reviewed the video interviews of Mr. Theodorou's interrogation, along with other available relevant information.
5. Based on my review, I created a detailed Forensic Report outlining the various problems and flaws with the police interrogation techniques employed during the interview.
6. The interrogation techniques used on Mr. Van Pernis are consistent with the Reid Technique. This technique is known to produce involuntary, false, incomplete, and unreliable statements from suspects.
7. It is my expert opinion that there were a significant number of coercive techniques used throughout the interview/interrogation (such as minimizations and maximizations) that in my opinion resulted in confession compliance.

8. These types of coercive techniques can be responsible for confusing a suspect's own words as well as the suspect making inculpatory statements or adapting a potential narrative proposed by the interviewer. It is my expert opinion this was the case here (see details of report).
9. In my experience and expertise, these coercive techniques significantly impact the voluntariness of the statements/confession resulting from the interrogation.
10. The details of my opinions are set forth in my report.
11. All opinions herein are rendered to a reasonable degree of certainty.

FURTHER AFFIANT SAYETH NOT.



Brian Leslie.

Sworn before me and subscribed in my presence this 20th day of June 2023.



NOTARY PUBLIC

CHAITANAYA GHAI
Kingsbridge Law
1225 Kennedy Rd Suite 2000
Scarborough, ON M1P 4Y1
P: (289) 459-0134 E: notary@klawfirm.ca
LSO #83303B

